

EXHIBIT 14

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 AUSTIN FENNER and IKIMULISA
5 LIVINGSTON,

6 Plaintiffs,

7 vs.

09CIV9832

(BSJ(RLE))

8 NEWS CORPORATION, NYP HOLDINGS,
9 INC., d/b/a THE NEW YORK POST,
10 and DAN GREENFIELD and MICHELLE
11 GOTTHELF,

12 Defendants.

13 -----
14 SANDRA GUZMAN,

15 Plaintiff,

16 vs.

09CIV9323

(BSJ(RLE))

17 NEWS CORPORATION, NYP HOLDINGS,
18 INC., d/b/a THE NEW YORK POST,
19 and COL ALLAN, in his official
20 and individual capacities,

21 Defendants.

22 -----
23 DEPOSITION OF JOE ROBINOWITZ

24 New York, New York

25 June 14, 2012

Reported by:

MARY F. BOWMAN, RPR, CRR

JOB NO. 50552

<p style="text-align: right;">Page 50</p> <p>1 ROBINOWITZ</p> <p>2 A. I don't know.</p> <p>3 Q. Isn't it true, Mr. Robinowitz, that</p> <p>4 Les Goodstein works for News Corporation?</p> <p>5 MS. LOVINGER: Objection.</p> <p>6 A. I don't know. I don't know who his</p> <p>7 employer is.</p> <p>8 Q. Do you know if the New York Post</p> <p>9 owns the community newspapers?</p> <p>10 MS. LOVINGER: Objection.</p> <p>11 A. I do not know.</p> <p>12 Q. Do you know what work Les Goodstein</p> <p>13 performed in connection with the community</p> <p>14 newspapers when Sandra Guzman worked at the</p> <p>15 Post?</p> <p>16 MS. LOVINGER: Objection.</p> <p>17 A. I do not, other than that he was in</p> <p>18 charge of them.</p> <p>19 Q. So when you went to speak to Les</p> <p>20 Goodstein in his office, wasn't it in</p> <p>21 connection with your employment at the New</p> <p>22 York Post?</p> <p>23 MS. LOVINGER: Objection.</p> <p>24 A. No, sir. It was in connection with</p> <p>25 my overseeing the editorial operations of --</p>	<p style="text-align: right;">Page 51</p> <p>1 ROBINOWITZ</p> <p>2 Q. OK.</p> <p>3 A. -- community newspaper --</p> <p>4 MS. LOVINGER: He has to finish</p> <p>5 answering the question before you ask</p> <p>6 another question.</p> <p>7 Q. Mr. Robinowitz, do you still spend</p> <p>8 Fridays working with the editors of the</p> <p>9 community newspapers?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And when Sandra Guzman was one of</p> <p>12 your direct reports, did you also spend</p> <p>13 Fridays working with the editors of those</p> <p>14 newspapers?</p> <p>15 MS. LOVINGER: Objection.</p> <p>16 A. I don't understand the question.</p> <p>17 Q. OK. Have you spent most of your</p> <p>18 Fridays since the acquisition of the</p> <p>19 community newspapers working with the editors</p> <p>20 at those newspapers?</p> <p>21 A. Most, yes.</p> <p>22 Q. Do you get a paycheck from any</p> <p>23 other entity other than the New York Post?</p> <p>24 A. No, sir. My paycheck is from --</p> <p>25 Q. OK. So the work --</p>
<p style="text-align: right;">Page 52</p> <p>1 ROBINOWITZ</p> <p>2 MS. LOVINGER: Again, he is still</p> <p>3 speaking. This is crazy. I have never</p> <p>4 seen a deposition where the attorney</p> <p>5 taking the deposition keeps cutting him</p> <p>6 off.</p> <p>7 MR. THOMPSON: Ms. Lovinger, don't</p> <p>8 raise your voice at me.</p> <p>9 MS. LOVINGER: You are doing it</p> <p>10 again and again and again.</p> <p>11 MR. THOMPSON: Look, don't ever</p> <p>12 raise your voice at me. I thought he was</p> <p>13 finished.</p> <p>14 Q. Mr. Robinowitz, is it fair to say</p> <p>15 that in connection with the work that you</p> <p>16 perform relating to the community newspapers,</p> <p>17 you are paid a salary by the New York Post?</p> <p>18 Correct?</p> <p>19 A. My only salary is from the New York</p> <p>20 Post.</p> <p>21 Q. So isn't it also fair to say that</p> <p>22 part of your duties as a New York Post</p> <p>23 employee is to work with the editors at the</p> <p>24 community newspapers?</p> <p>25 A. Col Allan asked me to do that when</p>	<p style="text-align: right;">Page 53</p> <p>1 ROBINOWITZ</p> <p>2 we made this acquisition, and I accepted.</p> <p>3 Q. Do you recall when you became</p> <p>4 Sandra Guzman's direct supervisor?</p> <p>5 A. Yes. It was the latter half of</p> <p>6 2007.</p> <p>7 Q. How did you end up becoming her</p> <p>8 direct supervisor at the end of 2007?</p> <p>9 MS. LOVINGER: Objection.</p> <p>10 You can answer if you understand</p> <p>11 the question.</p> <p>12 A. The man that was supervising her,</p> <p>13 Chris Shaw, was put in a different position</p> <p>14 to run the NYPost.com website, so there</p> <p>15 became a -- you know, an opening there, and</p> <p>16 Col asked me to step in. And again, I said</p> <p>17 fine.</p> <p>18 Q. So when you say Col asked you to</p> <p>19 step in, do you mean Col Allan asked you to</p> <p>20 supervise Ms. Guzman?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Did you have any interaction with</p> <p>23 Ms. Guzman before you became her direct</p> <p>24 supervisor?</p> <p>25 MS. LOVINGER: Objection.</p>

<p style="text-align: right;">Page 54</p> <p>1 ROBINOWITZ</p> <p>2 A. Very little. Only to say hi, how</p> <p>3 are you doing, have a nice weekend. That</p> <p>4 sort of thing.</p> <p>5 Q. Do you know how long Chris Shaw</p> <p>6 served as Ms. Guzman's direct supervisor</p> <p>7 before you took over that position?</p> <p>8 A. I do not recall.</p> <p>9 Q. Did you have any interactions with</p> <p>10 Chris Shaw?</p> <p>11 MS. LOVINGER: Objection.</p> <p>12 Q. Prior to becoming Ms. Guzman's</p> <p>13 direct supervisor?</p> <p>14 A. Again, to say hi, how are you.</p> <p>15 That's -- you know, pleasantries of the</p> <p>16 office. I know the people in the office.</p> <p>17 But --</p> <p>18 Q. Did you find Chris Shaw to be an</p> <p>19 honest person at the time?</p> <p>20 MS. LOVINGER: Objection.</p> <p>21 A. How would I know? I don't know.</p> <p>22 Q. Did you ever know him to make false</p> <p>23 statements?</p> <p>24 MS. LOVINGER: Objection.</p> <p>25 A. I wouldn't know.</p>	<p style="text-align: right;">Page 55</p> <p>1 ROBINOWITZ</p> <p>2 Q. Did he ever say anything to you</p> <p>3 about Sandra Guzman's work performance?</p> <p>4 A. Not that I can recall.</p> <p>5 Q. Before you became Sandra Guzman's</p> <p>6 direct supervisor, did you ask Chris Shaw to</p> <p>7 tell you anything about her work performance</p> <p>8 since you were going to be taking over that</p> <p>9 position?</p> <p>10 MS. LOVINGER: Objection.</p> <p>11 A. Not that I recall.</p> <p>12 Q. I am going to show you now what is</p> <p>13 marked as Deposition Exhibit 2. It is Bates</p> <p>14 stamped SG391.</p> <p>15 (Exhibit 2, document Bates stamped</p> <p>16 SG391 marked for identification, as of</p> <p>17 this date.)</p> <p>18 Q. Have you had a chance to look at</p> <p>19 that?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Was this the management structure</p> <p>22 at the Post in place when you were Sandra</p> <p>23 Guzman's direct supervisor?</p> <p>24 MS. LOVINGER: Objection.</p> <p>25 A. No. I mean the first thing I see</p>
<p style="text-align: right;">Page 56</p> <p>1 ROBINOWITZ</p> <p>2 is a line that goes straight from Rupert</p> <p>3 Murdoch to me. I've never reported to Rupert</p> <p>4 Murdoch. I don't know whether he -- as I</p> <p>5 said, I don't know whether he is chairman or</p> <p>6 president.</p> <p>7 I don't know who Col Allan reports</p> <p>8 to. It looks like he reports to Carlucci. I</p> <p>9 don't know if that's true. I just don't</p> <p>10 know. I don't even know if he is</p> <p>11 editor-in-chief or just editor.</p> <p>12 Frank Zini's name is misspelled</p> <p>13 down here. This -- I don't -- you know, I</p> <p>14 see a lot of things about this document</p> <p>15 that --</p> <p>16 Q. Do you know who created this</p> <p>17 document?</p> <p>18 MS. LOVINGER: He was still</p> <p>19 speaking.</p> <p>20 A. I do not know who created this</p> <p>21 document.</p> <p>22 Q. Did there come a time,</p> <p>23 Mr. Robinowitz, when Sandra Guzman was</p> <p>24 terminated?</p> <p>25 A. Yes, there did.</p>	<p style="text-align: right;">Page 57</p> <p>1 ROBINOWITZ</p> <p>2 Q. Why was she terminated?</p> <p>3 A. Because the section that she was</p> <p>4 hired to edit, Tempo, was canceled.</p> <p>5 Q. Was Tempo the only section</p> <p>6 Ms. Guzman was editing at the New York Post</p> <p>7 at the time of her termination?</p> <p>8 A. No, sir. She was editing other</p> <p>9 sections.</p> <p>10 Q. I want you to identify each and</p> <p>11 every other section Ms. Guzman was editing at</p> <p>12 the New York Post at the time of her</p> <p>13 termination.</p> <p>14 A. I can do that to the best of my</p> <p>15 recollection.</p> <p>16 Q. OK.</p> <p>17 A. The education sections, maybe four</p> <p>18 or five of those a year. The parade</p> <p>19 sections. Maybe there were three or four of</p> <p>20 those a year. Black History Month section,</p> <p>21 once a year. Harlem Week section, once a</p> <p>22 year. And Go Green section once a year.</p> <p>23 Q. Any other sections?</p> <p>24 A. None that I can recall.</p> <p>25 Q. Isn't it true, Mr. Robinowitz, that</p>